

Rapaport Law Firm, PLLC | Attorneys at Law | 80 Eighth Avenue | Suite 206 | New York, NY 10011 | Tel 212.382.1600 | Fax 212.382.0920 | www.rapaportlaw.com

Rapaport Law Firm

Marc A. Rapaport*
Tel (212) 382-1600
Fax (212) 382-0920
mrpaport@rapaportlaw.com

*Member NY & NJ Bars

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 3/14/2024
--

March 13, 2024

Hon. Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

**Re: Andujar v. SKYC Management LLC et al.
Case No. 23-cv-08764(MKV)(KHP)**

Dear Judge Vyskocil:

I represent plaintiff, Victor Andujar (“Plaintiff”) and three opt-in plaintiffs, Silvio Bernabel, Angel Lugo, and Juan D. Jimenez (collectively, the “Opt-in Plaintiffs”) in the above-referenced matter, which involves wage and hour claims. With Defendants’ consent, Plaintiffs write to request an extension of Plaintiffs’ deadline to move for conditional certification of a collective and permission to send notice to potential opt-in members pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b). The current deadline for Plaintiffs’ contemplated motion is March 20, 2024. Plaintiffs request that this be extended to April 5, 2024.


Plaintiffs make this request because I have experienced a death in my immediate family. As a result, I have not been able to perform significant work on this matter, or on other matters, for approximately two weeks.

There have been no previous requests for an adjournment of this deadline. As noted above, Defendants’ counsel consents to this request. The requested extension will solely affect the briefing scheduling relating to conditional certification. The parties have agreed upon the following, revised briefing schedule: Plaintiffs shall file their motion by April 5, 2024. Defendants shall file their opposition by April 29, 2024. Any reply is due May 9, 2024.

Mary Kay Vyskocil, U.S.D.J.
March 13, 2024
Page 2 of 2

Respectfully submitted,

RAPAPORT LAW FIRM, PLLC

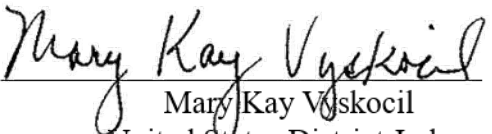
By: _____

Marc A. Rapaport, Esq.
80 Eighth Ave., Suite 206
New York, NY 10011
Tel: 212-382-1600
mrapaport@rapaportlaw.com

*Attorneys for Plaintiff and the Putative
Collective and Class*

Granted. SO ORDERED.

Date: March 14, 2024
New York, New York



Mary Kay Vyskocil
United States District Judge